



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP/AS  
F. #2021R00600

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 5, 2025

By Email and ECF

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Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation:

<b>Bates No.</b>	<b>Description of Item</b>
EDNY_133244-EDNY_133958	Records from the New York State Executive Chamber
EDNY_133959-EDNY_133975	Final translations of audio chat messages previously produced in draft summary form as EDNY_050121-EDNY_050143
EDNY_133976-EDNY_134105	Final translations of text chat messages previously produced in draft summary form as EDNY_050121-EDNY_050143

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney  
Eastern District of New York

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